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Ms. Marianne Milette
U.S. Environmental Protection Agency
5 Post Office Square, Suite 100 (SEP)
Boston, MA 02109-3912

February 4, 2010

Re: CAFO #TSCA-01-2006-0060
500 Flatbush Avenue, Hartford, CT

Dear Ms. Milette,

This letter is sent to you on behalf of Danny Corporation and is intended to update the Environmental Protection Agency (EPA) concerning the status of work being conducted under a Consent Agreement and Final Order (CAFO) between Danny Corporation (Danny Corp) and EPA at the subject property.

Danny Corp has had ongoing negotiations with its tenant, Metal Management Aerospace (MTLM), about surrendering occupancy and cessation of operations. Implementation of work under this CAFO has been done in a phased manner in order to accommodate the tenant's continued use of the property. Concurrent with the tenant's occupancy, Danny Corp has made every effort to comply with the provisions of the CAFO and make reasonable progress.

An agreement has been reached with MTLM to cease operations by the end of 2010. To this end, Danny Corp and its representatives have prepared certain lease termination documents to ensure that the tenant addresses its environmental obligations under the lease termination agreement and prior to departure. We will update the EPA again if the tenant's schedule changes.

This letter references only active phases of the CAFO.

Phase I Activities - Articles 25 and 26

In January 2008, EPA approved a Phase I Cleanup Plan which discussed PCB-contamination concrete in the floor of the former APS building. Implementation included cleaning of the concrete floor by the double-wash double-rinse method. This work was documented in the Phase I PCB Cleanup Completion Report. The Cleanup Plan was later amended to propose containment by encapsulation, which was approved by EPA in a letter dated February 25, 2009.

A letter was issued by Weston Solutions, on behalf of Danny Corp, on July 14, 2009 to notify EPA that an agreement was reached with the tenant to discontinue use of the former APS building. As such, the final cleaning or removal of the PCB-laden concrete was deferred until the Phase III cleanup, after the tenant vacates the property.

The building has been vacated and the three pass doors accessing the building are kept in a locked condition, with building access under the sole control of Danny Corp. The M_L

mark has been placed immediately inside the three pass doors to warn of the presence of PCBs.

Phase II Activities - Article 27

The Phase II PCB Cleanup Plan (Phase II Plan) was submitted to EPA in October 2007.

EPA provided comments on the Phase II Plan in January 2008. EPA was concerned that use of the Accelerated Solvent Extraction Method (EPA Method 3545) was under-reporting PCB concentrations in soil when compared to the Soxhlet sample extraction method (EPA Method 3540C). Danny Corp evaluated this concern by comparing PCB concentrations obtained from split samples collected from the site and analyzed using both the ASE and Soxhlet extraction methods. The results of these analyses indicated that PCB concentrations detected using the Soxhlet extraction method were, on average, about 30 percent greater than those concentrations detected using the ASE method.

EPA further indicated that additional delineation of the extent of PCB contamination was required for certain composite soil samples which were extracted using the ASE method. These samples had PCB concentrations that approached the Site PCB cleanup level. EPA believed that the PCB concentrations in these samples may be greater if extracted using the Soxhlet method and may in some instances exceed the Site PCB cleanup levels.

In EPA's January 14, 2008 comments on the Phase II Cleanup Plan EPA stated that the use of ASE extraction cannot be accepted without first performing a comparison study to verify that the PCB concentrations obtained through the use of ASE extraction are valid representations of the PCB concentrations that would be obtained using Soxhlet extraction. EPA also suggested that some of the samples should be re-analyzed using Soxhlet extraction to verify that PCB concentrations are below required standards.

In lieu of performing a comparison study, Danny Corp intends to re-analyze selected samples by Soxhlet. Selection of samples for re-analysis was based on the observation that PCB concentrations detected by ASE were approximately 27 percent lower than those detected by Soxhlet. Samples (both composite and grab samples) selected for re-analysis have with PCB concentrations that are 30 percent or less below the Site PCB cleanup limit (or in the case of composite samples, the PCB cleanup level normalized to the number of grabs comprising the composite) . A revised list of these samples is provided in the attached Table 1.

It was assumed that an ASE extracted sample with a PCB concentration that was more than 30 percent below the Site PCB cleanup level (or in the case of composite samples more than 30 percent below its normalized cleanup level) should not require re-analysis, since it is not likely that these samples would exceed the PCB cleanup level even if they were re-analyzed using Soxhlet extraction. Conversely, re-analysis of grab samples extracted by the ASE method that exceed the Site PCB cleanup level is not proposed since the Soxhlet extraction is unlikely to result in a lower concentration.

Proposed Re-Analysis Plan

Reserve grab samples aliquots were collected from the Site during the Phase II characterization sampling program. These samples were properly preserved (frozen) in the event further analysis was required. The reserve grab samples listed in Table 1 have been selected for re-analysis using Soxhlet extraction because they fall into one or more of the following categories:

- Composite samples analyzed by the ASE method where the composite PCB concentration is within 30 percent of the applicable composite-normalized Site PCB cleanup level;
- Grab samples from composites analyzed by the ASE method where the composite PCB concentration is within 30 percent of the applicable composite-normalized Site PCB cleanup level;
- Grab samples analyzed by the ASE method that are within a concentration range that is 30 percent or less than the applicable Site PCB cleanup level.
- Grab samples from composite samples analyzed by the ASE or Soxhlet method where the composite-normalized PCB concentration exceeded the composite-normalized Site PCB cleanup level but where it is likely that the PCB concentration in one or more grab samples comprising the composite is below the applicable project PCB cleanup level;

PCB concentrations obtained by the re-analysis of the selected composite and grab samples will be added to the existing database and used to identify areas of the site requiring additional investigation or remediation. Pending the outcome of the re-analysis, localized additional sample collection may be required to further delineate PCB contaminated soil exceeding applicable Site PCB cleanup levels. The results will be documented in the Phase II cleanup Completion Report.

We request EPA's concurrence with the proposed Phase II sample re-analysis plan described above.

Inspection and Monitoring Activities – Articles 32 and 33

Danny Corp has long term plans in place to monitor and maintain asphalt and concrete paved surfaces and unpaved surfaces and the north and south interceptor trenches. The monitoring activities do not include air monitoring since the results of the Phase I activities concluded that no indoor risk exists in the Main Building and the APS building no longer in use. The inspections included the following:

- Inspection of the north and south interceptor trenches every two weeks to determine their condition and remove accumulated oily water.

- General inspection of the property once per month to observe the condition of paved and unpaved surfaces and the drainage system.
- Inspection of the site twice per year as on-going monitoring associated with the interceptor trench systems along the eastern portion of the Site. These inspections are recorded in an annual letter to the Connecticut Department of Environmental Protection.

Additionally, in conjunction with finalization of the lease termination agreement with the tenant, Danny Corp has clarified and coordinated the tenant's environmental obligations. This Plan addresses the Tenant's obligations to clean paved surfaces and concrete structures and maintain the stormwater system in accordance with the Tenant's Stormwater Pollution Prevention Plan and Spill Prevention, Control and Countermeasures Plan. Once the tenant vacates the Site, Danny Corp will modify these plans as appropriate for post tenant site uses.

Danny Corp invites EPA comment on the above ongoing inspection monitoring plans and procedures.

The schedule for implementation of the Phase II reanalysis is dependent on receiving approval from EPA. Please contact me at (860) 368-3205 if you have any questions or require additional information.

Sincerely,
Weston Solutions, Inc.

John L. Meyer
Project Manager

cc: M. Suisman, Danny Corporation
A. Kosloff, Esq., Levy & Droney, PC
D. Johnson, Esq., Murtha Cullina, LLP
J. Woodyard P.E., T. Walles, Weston
K. Tisa, EPA

Attachment:
Table 1. List of Samples for Further Analysis

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TABLE 1

DANNY CORP
500 FLATBUSH AVENUE, HARTFORD CONNECTICUT
SOIL SAMPLE RE-ANALYSIS LIST

The following soil samples from the 500 Flatbush Avenue site, Hartford, Connecticut have been preserved by freezing and will be reanalyzed using the Soxhlet extraction method (EPA Method 3540C) to further evaluate whether PCB concentrations exceed applicable EPA PCB cleanup levels.

Composite Samples for Re-Analysis using Soxhlet Extraction

DCSYDA-0507-CSO119, 123, 124, 125-01 (4.500 mg/kg)
DCSA-0507-CSO39, 40, 46-01 (5.080 mg/kg)

Grab Samples for Re-Analysis using Soxhlet Extraction

DCSYDA-0507-SO129-01 (9.410 mg/kg)
DCCSA-0507-SO6-01 (7.330 mg/kg)
DCOHC-0507-SO7-01 (9.750 mg/kg)
DCOHC-0507-SO9-01 (8.490 mg/kg)
DCOHC-0507-SO21-01 (9.050 mg/kg)
DCCSA-0507-SO6-01 (7.330 mg/kg)
DCSA-0507-SO15-01 (5.040 mg/kg)
DCSA-0507-SO16-01 (not analyzed)
DCSA-0507-SO17-01 (7.100 mg/kg)
DCSA-0507-SO22-01 (9.120 mg/kg)
DCSA-0507-SO24-01 (9.260 mg/kg)
DCSA-0507-SO36-01 (7.820 mg/kg)
DCSA-0507-SO43-01 (9.710 mg/kg)
DCSA-0507-SO48-01 (8.020 mg/kg)
DCSA-0507-SO50-01 (9.070 mg/kg)
DCSA-0507-SO51-01 (7.040 mg/kg)
DCEBL-0507-SO14-01 (8.330 mg/kg)